

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Parker Tirrell, by her parents and next friends)	
Sara Tirrell and Zachary Tirrell, and)	
)	
Iris Turmelle, by her parents and next friends)	
Amy Manzelli and Chad Turmelle,)	
)	
Plaintiffs,)	
)	
v.)	Civil No. 1:24-cv-00251-LM-TSM
)	
Frank Edelblut, in his official capacity as)	
Commissioner of the New Hampshire Department)	
Of Education, et al.)	
)	
Defendants.)	
)	

ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO
PLAINTIFFS' AMENDED COMPLAINT AND TO INTERVENOR-DEFENDANT'S
MOTION TO INTERVENE TO, AND INCLUDING, JUNE 4, 2025

Pursuant to Local Rule 7.2 of the Rules of this Court, the United States, on behalf of Federal Defendants, moves this Court to extend the deadline by which it must answer Plaintiffs' Amended Complaint (DN 95) and respond to Intervenor-Defendant's Motion to Intervene (DN 105) to, and including, June 4, 2025. In support of this Motion, Federal Defendants state as follows:

1. On March 14, 2025, Federal Defendants filed, and the Court granted, an Assented-To Motion to Extend Time to Respond to the Proposed Potential Intervenor's Motion to Intervene to April 21, 2025 (DN 119), the date that Federal Defendants' Answer to Plaintiffs' Complaint is also due.

2. Due to limited staff resources, undersigned counsel is managing a heavy caseload while trying plan a transition due to his retirement at the end of next month. A Washington-based Department of Justice attorney assisting undersigned counsel has 13 dispositive motions or objection deadlines due between now and the beginning of June.

For the above reasons, an extension of time will be needed to prepare a well-informed response to Intervenor-Defendant's Motion to Intervene (DN 105), and an answer to Plaintiffs' Amended Complaint (DN 95) from the current deadline of April 21, 2025 to, and including, June 4, 2025.

Counsel for all parties have been contacted and assent to this extension of time.¹

The requested extension will not result in the continuance of any hearing, conference or trial. Due to the nature of this Motion, no supporting memorandum of law is required.

Respectfully submitted,

John J. McCormack
Acting United States Attorney

Dated: April 21, 2025

/s/ Robert J. Rabuck
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¹ Undersigned counsel did not contact counsel for the potential Intervenor-Defendant for assent since it is not yet a party to the case.